

Appl. No. 10/033,716
Amdt. dated December 19, 2005
Reply to Office action of November 4, 2005

Docket No. 10407-559

REMARKS

In response to the Office Action mailed November 4, 2005, the Examiner's claim rejections have been considered. Applicants note that the Examiner has withdrawn the rejection under MacDoran *et al.* (U.S. Patent No. 5,757,916). Applicants have fully considered the references (Goertzel *et al.* and Mark) as potentially teaching all or part of the claimed invention. Applicants have also considered the context of the passage taught by the references as cited by the Examiner. As such, the Applicants' response is not directed to a specific portion of the cited reference, but rather to the reference as a whole. Applicants respectfully traverse all rejections regarding all pending claims and earnestly solicit allowance of these claims.

1. Claim Rejection 35 U.S.C. § 103(a) – Claims 1-21, 23, 24, 26-68, 70-76

Claims 1-21, 23, 24, 26-68, 70-76 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goertzel *et al.* (U.S. Patent No. 6,308,273) in view of Mark (U.S. Patent No. 5,732,133). Applicants respectfully traverse this rejection. For brevity, only the bases for the rejection of the independent claims are traversed in detail on the understanding that the dependent claims are also patentably distinct over the prior art, as they depend directly from their respective independent claims. Nevertheless, the dependent claims include additional features that, in combination with those of the independent claims, provide further, separate, and independent bases for patentability.

Applicants respectfully submit that Goertzel and Mark, alone or in combination, do teach, suggest, or disclose a system for enabling remote access to an application server that includes "a number authentication system that provides anti-circumvention protection that prevents activation of a dialer from a location other than the user location." As noted by the Examiner, Goertzel does not teach or disclose a number authentication mechanism providing anti-circumvention protection. Mark does not make up for this deficiency as this reference merely teaches a system of encrypting touch tones. Specifically, Mark teaches that "an auto-dialer can encrypt calling card and other data...by selectively altering pre-selected characteristics of a DTMF tone sequence." (See, col. 5, line 66- col. 6, line 7). As such, Mark teaches methods of preventing touch tone information from being stolen. Applicants respectfully submit that encrypting touch tones is not the same as providing anti-circumvention protection by preventing

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activation of a dialer at a location other than the user location. Because the Goertzel and Mark references fail to teach or suggest all of the claimed elements, Applicants respectfully request the rejection be withdrawn. Accordingly, Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection of claims 1-21, 23, 24, 26-68, and 70-76 has been overcome.

2. Claims Rejections - 35 U.S.C. §103(a) – Claims 22, 25, and 69

Claims 22, 25, and 69 stand rejected as being unpatentable over Goertzel *et al.* (U.S. Patent No. 6,508,710). According to a teleconference with the Examiner on November 21, 2005, U.S. Patent No. 6,508,710 was improperly cited. Rather, the rejection is based on Goertzel *et al.* (U.S. Patent No. 6,308,273) and Mark (U.S. Patent No. 5,732,133). Applicants respectfully traverse this rejection. In light of the arguments submitted in Section 1 of this response, Applicants submit that the dependent claims 22, 25, and 69 are not obvious in view of Goertzel and Mark, because these references, alone or in combination, fail to teach, suggest, or disclose "a number authentication system that provides anti-circumvention protection that prevents activation of a dialer from a location other than the user location." Moreover, the dependent claims include additional features that, in combination with those of the independent claims, provide further, separate, and independent bases for patentability. Accordingly, the Applicants respectfully submit that the 35 U.S.C. § 103(a) rejection of claims 22, 25, and 69 as unpatentable over Goertzel and Mark has been overcome.

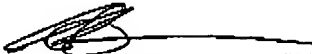
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CONCLUSION

Applicants have made an earnest and *bona fide* effort to clarify the issues before the Examiner and to place this case in condition for allowance. In view of the foregoing discussions, it is clear that the differences between the claimed invention and the cited references are such that the claimed invention is patentably distinct over the cited references. Therefore, reconsideration and allowance of all of claims 1-21, 23, 24, 26-68 and 70-76 are believed to be in order, and an early Notice of Allowance to this effect is respectfully requested. If the Examiner should have any questions concerning the foregoing, the Examiner is invited to telephone the undersigned attorney at (310) 712-8323. The undersigned attorney can normally be reached Monday through Friday from about 9:30 AM to 6:30 PM Pacific Time.

Respectfully submitted,

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